BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Investigation pursuant to Senate Bill 380 to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon natural gas storage facility located in the County of Los Angeles while still maintaining energy and electric reliability for the region.

Investigation 17-02-002
(Filed February 9, 2017)

ISSAM NAJM'S COMMENTS ON THE ALJ'S PROPOSED DECISION TO RAISE THE MAXIMUM STORAGE VOLUME IN ALISO CANYON TO 68.6 BCF AND THE ASSIGNED COMMISSIONER'S ALTERNATE PROPOSED DECISION TO RAISE THE MAXIMUM STORAGE VOLUME IN ALISO CANYON TO 41.16 BCF

Pursuant to the California Public Utilities Commission's (Commission) Rules of Practice and Procedures, I, Issam Najm, provide my opening comments on the Administrative Law Judge's Proposed Decision (PD) to Raise the maximum storage volume in Aliso Canyon to 68.6 Bcf and the Assigned Commissioner's Alternate Proposed Decision (APD) to raise the maximum storage volume in Aliso Canyon to 41.16 Bcf.

Both the PD and APD are great disappointments to the community that has been gravely injured by this toxic facility operated by a careless company that could not stop the leak and that apparently cannot restore its own pipelines to full operating capacity. While the Commission wants to categorize this as a Rate Setting Proceeding, it has nothing to do with setting rates. This matter is an argument between a for-profit company that has inflicted great harm on a community under the Commission's watch. Yet, the Commission and its Energy Division (ED) staff are treating this as a debate between "parties" about rates and seemingly doing more to provide "due process" to private for-profit companies than worrying about the local residents who bear the cost of SoCalGas' incompetence. What we need is for the Commission to disallow this attempt by private companies to boost their profits on our backs.

This proceeding has gone on for four years. Along the way, the Commission, based on advice of ED staff, has steadily increased the allowable storage volume in the field with no demonstrated justification other than speculations about "potential" gas shortages, while turning a blind eye to all that SoCalGas has been doing to artificially force the higher use of the facility. On top of that, ED staff continues to relax the Aliso withdrawal protocols and give SoCalGas and its oil-company customers more use of the field to maximize their profits. There

is no justification for this, and it flies in the face of the demand by two Governors to expedite the shutdown of the facility by no later than 2027. In my opinion, ED staff is not acting in good faith and is not serving as the unbiased arbiter or independent analyst in this proceeding.

The following comments present a rebuttal to every claim made as a justification for the higher storage volume. Based on my experience to date, I anticipate that ED staff will ignore all of my comments, as the assumptions they repeatedly insist on making suggest they have had their minds made up from the outset. Nonetheless, I hope that the Commissioners will read them carefully and take to heart my observation that we, Porter Ranch residents, have repeatedly and consistently been sidelined and our concerns brushed aside.

Claim 1: The Need to Raise the Storage Volume is Based on Phase 2 Analysis

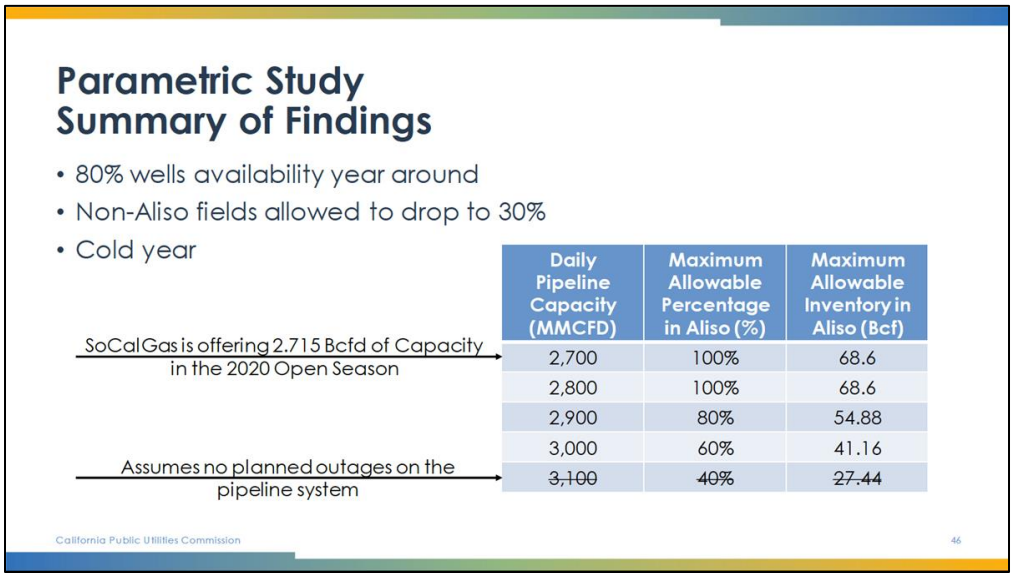
The PD and APD are based on a table of four options developed by ED Staff under Phase 2 of the proceeding. Table 1 in the PD and APD outlines the four options and is reproduced below.

Table 1: Daily Pipeline Capacity and Aliso Inventory

Daily Pipeline Capacity (MMcfd)	Maximum Inventory at Aliso (Bcf)
2,700	68.6
2,800	68.6
2,900	54.88
3,000	41.16

The Commission should notice that ED Staff only provided the Commission with options that result in an increase in the gas volume at Aliso. In essence, ED staff have forced the decision towards increasing the volume. Are those the only options? In fact, the original analysis included five options, with the fifth option requiring a maximum inventory of only 27.44 Bcf in Aliso Canyon, which is even lower than the current volume of 34 Bcf. However, ED Staff simply crossed out that option without analysis or explanation, and I have brought up this matter in comments multiple times since then, to no avail. Figure 1 is the slide from ED staff presentation at Workshop 4 under this proceeding, which was held in October 2020. The fifth option in that table is based on the assumption that the daily pipeline capacity was 3,100 MMcfd, which would be achieved if SoCalGas did not implement PLANNED outages on the pipeline system.

In other words, ED staff removed from consideration the only option that would have retained the current storage volume, or even allowed for reducing it to 27.44 Bcf, and thus FORCED the commission to consider nothing other than raising the volume in Aliso.



Parametric Study
Summary of Findings

- 80% wells availability year around
- Non-Aliso fields allowed to drop to 30%
- Cold year

SoCalGas is offering 2.715 Bcfd of Capacity in the 2020 Open Season

Assumes no planned outages on the pipeline system

Daily Pipeline Capacity (MMCFD)	Maximum Allowable Percentage in Aliso (%)	Maximum Allowable Inventory in Aliso (Bcf)
2,700	100%	68.6
2,800	100%	68.6
2,900	80%	54.88
3,000	60%	41.16
~~3,100~~	~~40%~~	~~27.44~~

Figure 1 – Slide 46 from CPUC ED Staff Presentation in Workshop 4 Under This Proceeding held on October 15, 2020

The term "capacity" is being manipulated and misrepresented in this proceeding, including by ED staff. The mere fact that pipeline capacity was not fully utilized does not mean that shippers cannot use that capacity. The disingenuous circularity of this treatment ignores that shippers can choose to pull gas from storage for economic reasons that have nothing to do with availability of pipeline capacity or supply, for that matter. Assuming an average usage that is lower than the full capability of the pipelines on the grounds that the pipeline capacity is not used purposefully conflates physical capacity with price and shipper motivations for using one versus the other.

There are two transmission capacities to consider. The first is the nominal transmission capacity which is the gas flow that the transmission system is designed to sustain and deliver into the SoCalGas system. That number is 3,780 MMcfd and it does not change. Then there is the allowed transmission capacity, which is the gas flow that SoCalGas will allow through its system. This capacity is reached as a result of the lowering of the maximum allowable pressure in the pipelines, which in turn reduces the gas flow through them, or by taking pipelines/compressors out of service for maintenance or other reasons. If SoCalGas properly

repaired the pipelines, then the actual capacity would be equal to the nominal capacity. Indeed, Figure 2 presents the actual available transmission capacity per SoCalGas's ENVOY system between 2010 and 2015. During every winter season, the transmission capacity that was made available by SoCalGas was between 3,750 and 3,850 MMcfd. In other words, during those periods, SoCalGas allowed its system to operate at its nominal capacity every winter season without hesitation.

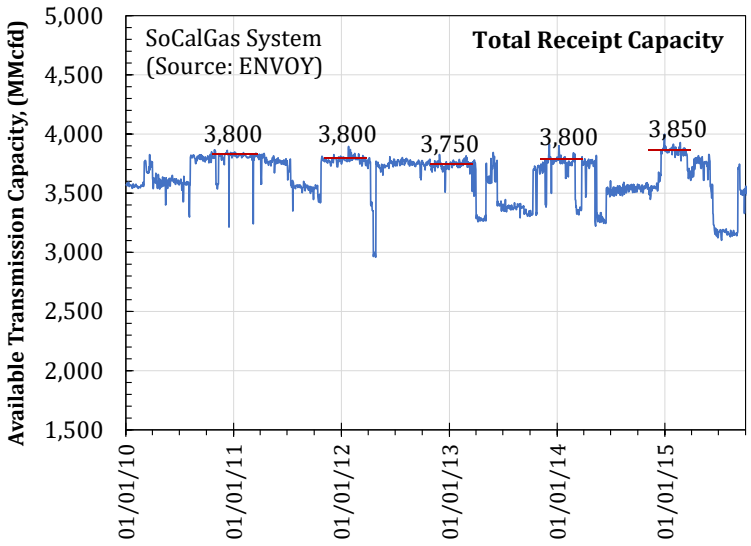


Figure 2 – Total Receipt Capacity Before the Aliso Well Blowout

On the other hand, Figure 3 presents the transmission capacity since the Aliso Canyon well blowout. For more than a year and a half after the blowout, the transmission capacity was around 3,500 MMcfd and higher. Then came the explosions at L235 and L4000 in the fall of 2017, which lowered the transmission capacity to a range between 2,500 MMcfd and 3,000 MMcfd. That was four (4) years ago, and SoCalGas provided the Commission with all the excuses for why it took it a long time to repair the pipelines. Finally, the pipelines were returned to service in late 2019, but at a reduced pressure. To this date, the public has no clear or detailed explanation for why the pipes are operated at a reduced pressure, and SoCalGas has made it clear that it has no intention to operate the system at its original capacity. But more importantly, I ask the Commission to look at the profile in Figure 3 and decide if the transmission capacity has actually increased at all since the pipeline outages? In fact, it has not. Regardless of what SoCalGas says about returning the pipelines to service at "reduced pressure", the fact is that their allowed capacity has not increased at all compared to when the

pipelines went out of service. The fact is that SoCalGas fully understands the relationship between the amount of gas it allows to flow through its pipelines and the need for Aliso Canyon as demonstrated by the values in Table 1. Yet, ED staff have accepted this reduced capacity to as an absolute given, and the Commission has never questioned SoCalGas throughout this proceeding about the reason for not raising the capacity to its original 2016 level of at least 3,500 MMcfd.

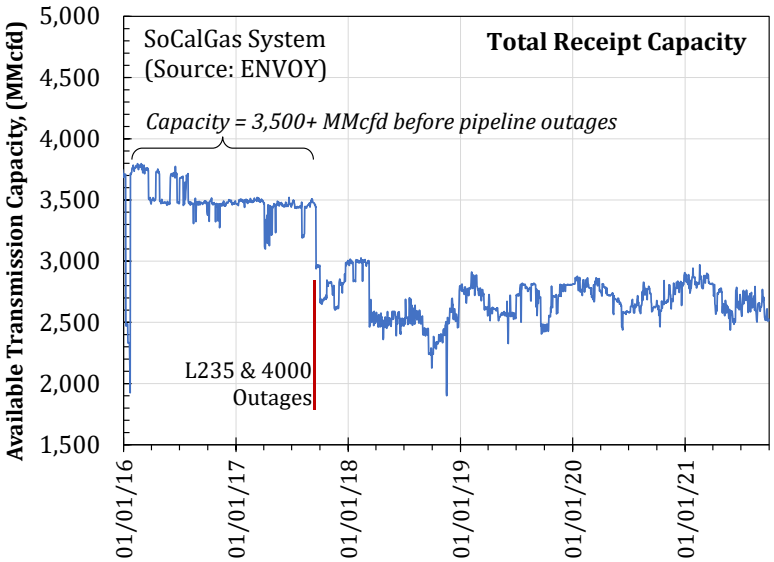


Figure 3 – Total Receipt Capacity since the Aliso Canyon Well Blowout

In the final analysis, the Commission should not accept a transmission capacity into the SoCalGas system that is less than 3,500 MMcfd and should demand it of SoCalGas. If the transmission capacity is increased to this level, there would clearly be no need to raise the maximum inventory in Aliso as shown in Table 1. But ED staff does not seem to want the Commission to know this.

Claim 2: A higher gas volume in Aliso is required to maintain reliability

This is absolutely false. Since the blowout of 2015, gas supply in the SoCalGas system has never been unreliable. In fact, the CPUC's own withdrawal protocol of November 2, 2017 made sure of it. That protocol, which is attached as Appendix A, set Aliso Canyon as an asset of last resort to be used only if needed to maintain system reliability. But then, in July 2019, after almost two years of L235 and L4000 being "out of service", ED staff abruptly modified the withdrawal protocols in the name of reliability and cost volatility (discussed later), and greatly

relaxed the withdrawal limitations to the joy of SoCalGas and its customers, and at the expense of the local residents' health and safety, which are clearly of no interest to ED staff. The modified protocol is attached as Appendix B. In this protocol Aliso was re-opened to SoCalGas customers to balance their gas demand aided by an extremely relaxed set of balancing rules that give a SoCalGas customer an entire month to balance its gas demand and supply, and only to within 8%. That's absurd!

If the Commission is concerned about gas reliability, then return to the original withdrawal protocol and set Aliso Canyon as an asset of last resort. Otherwise, the claim that additional use of Aliso is needed for system reliability is complete falsehood and an insult to our community. Moreover, the overly relaxed balancing rules are unjustified. When Aliso Canyon is closed, SoCalGas customers will have to operate within tighter balancing requirements, just like all gas customers operate in areas that are not plush with storage. Why shouldn't those requirements be in place now? Why wouldn't the Commission modify the balancing requirements now to ones where a user is required to balance their gas demand and supply within 5% over a 24 or 48-hour period? If an unbiased entity conducts the analysis, it will show the Commission that such balancing rules will greatly reduce the concern over gas reliability and further reduce the need for Aliso Canyon, which presumably is what the Commission's goal is. I would further note that the original 2016 Joint Agency Technical Assessment identified tighter balancing rules as critical. ED staff instead seeks looser balancing, which in turns leads to a claim that greater inventory is needed at Aliso. It is time for the Commission to reject this circular logic that ED staff has adopted.

Claim 3: Limited use of Aliso Canyon caused price volatility

SoCalGas and ED staff continue to use the limited availability of Aliso as the reason for the price volatility. That can't be further from the truth. At the January 11, 2019 Joint Agency workshop convened by the California Energy Commission (CEC) and the CPUC, CEC staff presented unambiguous data showing there was no significant gas price increase after the Aliso blowout, and that high price volatility occurred ONLY AFTER the explosion of Lines 235 and L4000. Figure 4 is a reproduction of the cost volatility data presented by Ms. Lana Wong of the CEC at the Joint Agency workshop, which was attended by then PUC President Picker and Commissioner Guzman-Aceves.[1] This same information was included in the 2019 IEPR.[2]

[1] https://efiling.energy.ca.gov/GetDocument.aspx?tn=226301&DocumentContentId=57064
[2] https://efiling.energy.ca.gov/getdocument.aspx?tn=232922, page 183

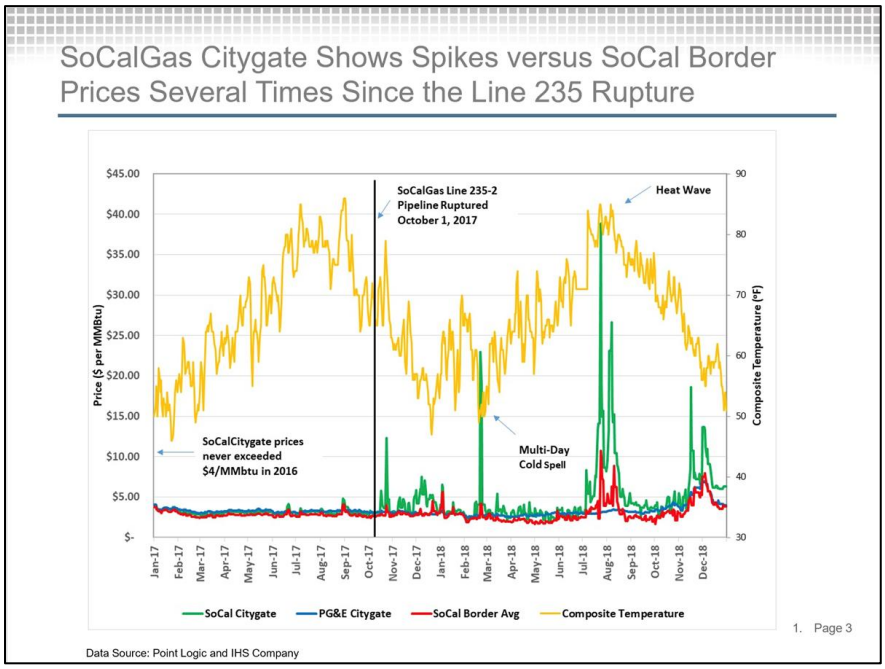


Figure 4 – Reproduction of Slide 3 of the Presentation by Ms. Lana Wong of the CEC during the Joint Agency Workshop of January 11, 2019 showing that price volatility was solely due to the failure of SoCalGas' transmission pipelines and had NOTHING to do with the loss of Aliso Availability as falsely claimed by CPUC ED staff

Yet, ED staff continues to propagate the misleading falsehood that the limited availability of Aliso Canyon is the main reason for price volatility. ED staff is happy to give SoCalGas and its customers more use of Aliso Canyon at the expense of the health and safety of the local community, and never questioning why SoCalGas is keeping the transmission capacity artificially low as discussed earlier. Impaired health to the local community has a cost that must be weighed against higher or more volatile natural gas prices. Neither the PD nor the APD takes this matter into consideration. This issue may have been successfully excluded from the proceeding by SoCalGas and its oil-company customers, but it should not be excluded from the Commissions deliberation and consideration.

Claim 4: Storage Volume Available for Winter Demand

According to SoCalGas' summer 2021 technical assessment, which is repeated in the PD and APD, SoCalGas claims that under the best-case scenario for pipeline capacity, it can reach no more than 66.8 Bcf of underground storage inventory systemwide, which includes Aliso Canyon, Honor Rancho, La Goleta, and Playa del Ray. That report was dated May 17, 2021.

Figure 5 shows a profile of the systemwide storage inventory since November 1, 2020 as reported by ENVOY. By May 28, 2021, just 11 days after the issuance of the report, the total storage inventory in SoCalGas' already system exceeded 66.8 Bcf. In fact, by the end of last month, the four fields were full with a total inventory of 81 Bcf as shown in Figure 5. Did SoCalGas do far better than its best-case scenario, or should the Commission question SoCalGas' "scenario analysis" upon which ED staff seem to rely without hesitation?

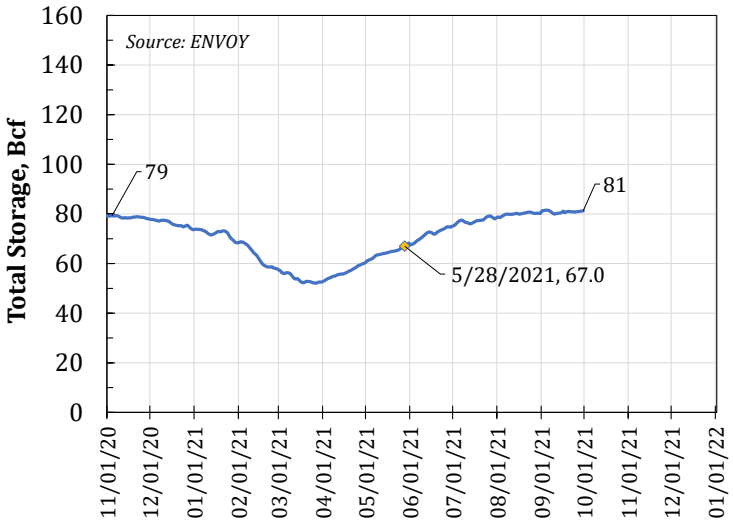


Figure 4 – Total Storage Volume in SoCalGas' System since 11/01/2020 showing the storage volume as of 09/30/2021 already at the maximum of 81 Bcf

No one likes paying higher prices. But what I like even less, and what I would hope the CPUC and our Governor like even less, are private companies that profit by injuring people. That is what has happened here with this blowout, and it is upsetting that the PD and APD are asking local residents to take on more risk so that SoCalGas and its oil-business customers can profit a little more from larger imbalance capability and price arbitrage. It seems that SoCalGas and its shippers now treat balancing as an entitlement. It is NOT. The CCST Report documented pipelines all across the country that do not have storage associated with them.[3]

Increasing the inventory does not come close to being worth the lives of innocent people. Enough is enough. This cannot continue to be an argument about money. The health and safety of hundreds of thousands of Californians are riding on this decision. Enough is enough!

[3] https://ccst.us/wp-content/uploads/Full-Technical-Report-v2_max.pdf

For the Commission's Consideration

If the Commission genuinely aims to close down Aliso Canyon as requested by Governors Brown and Newsom, it needs to start heading in that direction now. It should certainly not go in the opposite direction and make it even harder to retire Aliso Canyon, which is exactly what SoCalGas wants seemingly with the nfull support of ED staff. The Commission can stop this and do the right thing by implementing the following actions:

1. Set aside the PD and APD and maintain the Aliso Canyon maximum inventory at 34 Bcf
2. Restore the withdrawal protocol to the conditions laid out in the November 2, 2017 protocol in which Aliso Canyon is used as an asset of last resort.
3. Mandate the tightening of the balancing rules for all SoCalGas customers to within 5% over a 48-hour period.
4. Instruct SoCalGas to make available the full nominal capacity of its transmission system or provide the Commission and the public with a thorough, detailed, and credible explanation for why it cannot do so.
5. Take a second look at the mitigation measures identified by the Joint Agencies in 2016 and 2017 and use them to further reduce reliance on Aliso storage.

The above actions will make it clear that the Commission is heading towards eliminating the reliance on Aliso Canyon, while maintaining reliability of gas supply in the region, and controlling price volatility by ensuring that the full nominal capacity of the transmission system is available to gas users in Southern California. It will restore some faith that the CPUC actually hears the residents and will act to protect them from corporate giants who otherwise will profit at our expense.

Dated: October 21, 2021

Respectfully Submitted,

/s/ Issam Najm

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APPENDIX A

ALISO CANYON WITHDRAWAL PROTOCOL

NOVEMBER 2, 2017

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Aliso Canyon Withdrawal Protocol

11.2.17

Introduction

Southern California Gas Company (SoCalGas) may withdraw gas from the Aliso Canyon natural gas storage facility (Aliso Canyon) consistent with the protocol defined below. The protocol implements the following principles:

- Aliso Canyon will be treated as the "asset of last resort" used for withdrawals after all other alternatives have been exhausted as defined by the protocol and consistent with items 1.A. and 1.B, below;
- The priority of service under Southern California Gas Company Rule No. 23 shall remain in place should curtailments be required;
- If curtailments are required, SoCalGas shall consult with the applicable Balancing Authorities (the California Independent System Operator [CAISO] and the Los Angeles Department of Water and Power [LADWP]) before and during any curtailment;
- Should curtailments to electric generation create a risk to electric load that is critical to health and safety, withdrawals may be made consistent with the protocol; and
- Withdrawals will be made in a manner that ensures safety, maintains the integrity of the wells and storage facility, and is consistent with all rules and regulations concerning the safe use of Aliso Canyon.

Aliso Canyon Withdrawal Protocol

1. Withdrawals from Aliso Canyon. Withdrawals from Aliso Canyon will be based on forecasted and known conditions including but not limited to weather, overall gas demand, electric generation gas demand, and the current and anticipated operating condition of the SoCalGas system. Withdrawals will be made when, in coordination with the Balancing Authorities, it is determined that withdrawals are necessary to maintain reliability overall, to respond to a risk to electric system reliability, and/or to avoid or to limit curtailments to core and noncore customers. In all cases, withdrawals may only be made consistent with safe operation of the field and the system and in compliance with any mandated protocols for production from the field.

Within this context, withdrawals will be made if the circumstances described in A or B, below, occur:

A. The following three conditions exist:

   (1) SoCalGas has taken all appropriate actions it deems available and necessary to meet demand and to avoid curtailment of electric load and/or gas curtailments to core and noncore, non-electric generation customers. Such actions include the use of operational and emergency flow orders and coordination with Balancing Authorities to limit and/or reduce demand in effected areas; and
   (2) To avoid curtailments of electric load, the CAISO and/or LADWP, in coordination with SoCalGas, have activated their appropriate capacity emergency plans based on the existing and forecast conditions; and
   (3) There remains an imminent risk that curtailments of electric load will occur without additional gas supply.

B. There is an imminent and identifiable risk of gas curtailments created by an emergency condition that would impact public health and safety or result in curtailments of electric load that could be mitigated by withdrawals from Aliso Canyon. Such risk could arise due to emergencies on the gas pipeline system or because conditions require additional gas supply otherwise unavailable. Under such circumstances, when reliability is at risk and curtailment is imminent, SoCalGas may, at its sole discretion, execute a withdrawal from Aliso Canyon.

2. Readiness of the Aliso Canyon Field. SoCalGas shall take all actions necessary to allow for timely withdrawals and shall maintain the Aliso Canyon field on a standby basis as warranted by forecasted conditions/ risks to system reliability. Further, if at any time the CAISO declares a Flex Alert, SoCalGas shall coordinate with the CAISO and LADWP and make any preparations necessary to allow for a timely withdrawal.

3. Executing a Withdrawal Under Conditions Defined in 1.A. As operator of the Aliso Canyon storage facility, SoCalGas has the obligation to make an informed decision to withdraw gas from Aliso Canyon under the conditions defined in 1.A. above. In confirmation that those conditions have been met, SoCalGas shall contact the Balancing Authorities and confirm that they (the Balancing Authorities) have met the conditions in number 1.A. For information purposes, the California Public Utilities Commission (CPUC) shall be included in such contacts and may participate as appropriate.

Communications may be made using any method acceptable to SoCalGas, the CPUC, and the Balancing Authorities. SoCalGas, the Balancing Authorities, and the CPUC shall make all arrangements for the required communications and confirmations necessary with executing a withdrawal.

4. Noticing and Reporting. SoCalGas shall immediately notify the CPUC Energy Division (Energy Division) of the following: issuance of a Stage 4 or 5 Operational Flow Order or an Emergency Flow Order; in the event of an emergency that threatens system reliability and may require electric curtailments; and at the initiation of withdrawals from Aliso Canyon.

Within 24 hours of the cessation of a withdrawal from Aliso Canyon, SoCalGas shall provide the Energy Division with the following:

- the total and hourly withdrawals from the field;
- the number of wells used for making withdrawals and the SoCalGas identifier for each well used;
- the pre- and post-withdrawal Aliso working gas inventory;
- the hourly pipeline receipts for the calendar day(s) on which a withdrawal was made and the day immediately preceding the withdrawal;
- the hourly withdrawals by field from non-Aliso storage facilities for the calendar day(s) on which a withdrawal was made and the day immediately preceding the withdrawal;
- information concerning any anomalies experienced during the operation of the field;
- any repairs or mitigation required as a result of the withdrawal, including the time necessary to make them before another withdrawal could be made and the impact on the field's injection and withdrawal capacity; and
- whether the withdrawal was made under conditions identified in 1. B.

Within 30 days after a withdrawal, SoCalGas shall provide the Energy Division with a full description of the events and conditions leading up to the withdrawal, all actions taken prior to the withdrawal, and any observations or recommendations concerning the execution of future withdrawals. Further, SoCalGas shall identify and describe any steps or actions not taken that could have diminished or eliminated the need for a withdrawal and make comments and/or recommendations for future consideration.

If a withdrawal from Aliso Canyon was due to an activation of the CAISO or LADWP emergency plans as described in Section 1.A., the Balancing Authorities agree to submit a description of the event that includes forecast demand, operating reserve requirements, and anticipated capacity deficiencies based on the requested gas curtailments for the impacted hours. The CAISO and/or LADWP may also:

a) identify and describe any steps or actions not taken that could have diminished or eliminated the need for a withdrawal, and
b) make comments and/or recommendations for future consideration.

5. Effective Date. This protocol shall become effective November 1, 2017. The protocol shall remain in effect, subject to modification through the completion of the CPUC Investigation (I.)17-02-002, or such time as determined based on conditions.

APPENDIX B

MODIFIED ALISO CANYON WITHDRAWAL PROTOCOL

JULY 23, 2019

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Aliso Canyon Withdrawal Protocol
July 23, 2019

This Withdrawal Protocol replaces the November 2, 2017, version in its entirety.

Southern California Gas Company (SoCalGas) may withdraw gas from the Aliso Canyon natural gas storage facility (Aliso Canyon) consistent with the protocol defined below.

Aliso Canyon may be used for withdrawals only if any of the following conditions are met:

1. Preliminary[1] low Operational Flow Order (OFO) calculations for any cycle result in a Stage 2 low OFO or higher for the applicable gas day;
2. Aliso Canyon is above 70% of its maximum allowable inventory between February 1 and March 31; in such case, SoCalGas may withdraw from Aliso Canyon until inventory declines to 70% of its maximum allowable inventory;[2]
3. The Honor Rancho and/or La Goleta fields decline to 110% of their month-end minimum inventory requirements (shown in Table 1 below) during the winter season;[3] and/or
4. There is an imminent and identifiable risk of gas curtailments created by an emergency condition that would impact public health and safety or result in curtailments of electric load that could be mitigated by withdrawals from Aliso Canyon.

Table 1: Month-End Minimum Inventory (Bcf)

	Nov.	Dec.	Jan.	Feb.	March
Aliso Canyon	5.7	5.1	4.4	3.8	2.1
Honor Rancho	13.9	13.2	12.6	7.5	5.0
La Goleta	8.0	7.9	7.7	7.6	7.5
Playa del Rey	1.9	1.9	1.5	1.1	0.7
Total	29.5	28.1	26.2	20.0	15.3

[1] Preliminary low OFO calculations for a Gas Day shall be made: 1) prior to Cycle 1 using previous day's receipts, previous day's prices, and forecasted sendouts; 2) prior to Cycle 2; and 3) prior to Cycle 3.

[2] This measure is designed to ensure that there is enough systemwide injection capacity by April 1 (the start of the injection season) to fill the non-Aliso fields to a sufficient inventory level to meet summer demand.

[3] This measure is designed to ensure that adequate inventory levels remain at the non-Aliso fields before the end of each winter month. SoCalGas' Aliso Canyon Risk Assessment Technical Report 2018-19 Supplement identified month-end minimum inventory requirements needed to preserve withdrawal rates for core reliability. The report can be found here: http://cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2018/2018%2011%2002%20SoCalGas%20(R.%20Schwecke)%20letter%20to%20CEC%20enclosing%20WINTER%202018-19%20TECHNICAL%20ASSESSMENT.PDF

The CPUC may update the Withdrawal Protocol if it determines that a modification of the month-end minimum inventory requirements is necessary.

Withdrawals shall be made in a manner that ensures safety, maintains the integrity of the wells and storage facility, and is consistent with all rules and regulations concerning the safe use of Aliso Canyon.

If Aliso Canyon is used for withdrawals based on the conditions stipulated above, Aliso Canyon's inventory and withdrawal capacity shall be made available for balancing and for scheduling to entities who both serve core customers and own storage rights.

SoCalGas and the California Independent System Operator (CAISO) and the Los Angeles Department of Water and Power (LADWP) shall continue to coordinate to maintain gas and electric system reliability.

Curtailments

If curtailments are required despite Aliso Canyon withdrawals, SoCalGas shall consult with the CAISO and the LADWP before and during any curtailment. In the event of a curtailment, the priority of service under SoCalGas Rule No. 23 shall remain in place.[4]

Noticing

Prior to withdrawing gas from Aliso Canyon, SoCalGas shall post a Critical Notice to Envoy informing customers and the public that a withdrawal will take place and providing the reason for initiating the withdrawal as defined above. Whenever Aliso Canyon's inventory and withdrawal capacity are made available for balancing and for scheduling by customers who own storage rights, customers will be notified through the auto-generated notification in SoCalGas' Envoy system, which includes the OFO calculation and capacity utilization.

Reporting

Within 24 hours after the start of a withdrawal period, SoCalGas shall notify the CPUC's Energy Division (Energy Division) about the withdrawal event and state which of the above condition(s) led to the withdrawal event. If Condition 1 led to withdrawals from Aliso Canyon, SoCalGas shall provide all information included in the preliminary low OFO calculations, including price information. If Condition 4 led to withdrawals, SoCalGas shall provide all relevant information about the emergency event and what other options were considered in addition to use of Aliso Canyon.

In a monthly report to be provided on the third business day after each month in which withdrawals from Aliso Canyon occurred,[5] SoCalGas shall provide the CPUC's Energy Division both a confidential and public report with a full description of the events and conditions leading up to the Aliso Canyon withdrawal(s). The report shall include:

1. the total and hourly withdrawals from the field;

[4] Rule 23: https://www.socalgas.com/regulatory/tariffs/tm2/pdf/23.pdf

[5] The report would include the gas day starting on the first day of the month and include the gas day that ends on the first day of the subsequent month. A gas day is from 7am to 7am the following day.

2. the pre- and post-withdrawal Aliso Canyon working gas inventory;
3. the inventory of the non-Aliso fields before and after the Aliso Canyon withdrawal(s);
4. the geographical and/or the time price spread used in determining the OFO stages for the day(s) of the withdrawal(s) and the two days immediately preceding and following;
5. weather conditions in the SoCalGas service territory for the day(s) of the withdrawal(s) and the day immediately preceding the initiation of withdrawal(s);
6. the hourly pipeline receipts for the calendar day(s) on which a withdrawal was made and the day immediately preceding the initiation of withdrawal(s);
7. the hourly withdrawals by field from non-Aliso storage facilities for the calendar day(s) on which a withdrawal was made and the day immediately preceding the initiation of withdrawal(s);
8. demand response activations and Dial It Down Alerts; and
9. information concerning any anomalies experienced during the operation of the field.

Effective Date

This protocol is effective beginning July 23, 2019. The protocol shall remain in effect, subject to modification, through the completion of the CPUC Investigation (I.) 17-02-002 or such time as determined based on conditions.